



MEMO ENDORSED

MANAGING PARTNERS
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April 19, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court for the
Southern District of New York
40 Centre Street
New York, New York 10007

Re: *Gonzalez v. City of New York*, No. 22-cv-9119 (VEC)

Your Honor,

I write on behalf of the Plaintiff with Defendant's consent to request a 30-day extension of time, until May 19, 2023, for Plaintiff to move for an order awarding reasonable costs and fees, should such a motion be necessary. On April 5, 2023, the Court entered Judgment against Defendant pursuant to Rule 68, which provided for payment of "reasonable attorneys' fees, costs and expenses" (Dkt. 24). Pursuant to Fed. R. Civ. P. 54(d), Plaintiff's time to submit a motion for attorney's fees is April 19, 2023. The parties are working to attempt to resolve the issue of reasonable costs and fees in this matter and we request this extension of time to continue that effort. This is Plaintiff's first request for an extension of this deadline.

We appreciate the Court's time and attention to this request.

Sincerely,

Joshua S. Moskovitz

cc: All Counsel of Record

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink that reads 'Valerie Caproni'.

Date: 4/21/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE